

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

Post Office Structure Plan (POStPlan)

Docket No. N2012-2

**REPLY BRIEF OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO
NOTICE OF ERRATA [ERRATA]
(July 30, 2012)**

On Friday, July 27, 2012, the American Postal Workers Union, AFL-CIO (APWU) filed its Reply Brief in this docket. The press of other business and the need to submit the Reply Brief timely resulted in a filing that contained several errors that are being corrected in this Errata. Each correction is identified below. The APWU is filing a complete revised version of its Initial Brief as a replacement, with today's revision date noted in a footer appearing at the left margin.

Page Revision

- | | |
|-----|---|
| 1 | insert "the" before "apparent" and "where" before "60%" in the second sentence |
| 1 | replace second sentence in the second paragraph with
"In N2011-1 APWU proposed that the Postal Service consider and evaluate a reduction in hours as a first alternative whenever the Postal Service conducted a discontinuance study." |
| 1 | insert "or independently" after "otherwise" in last full sentence |
| 1-2 | replace "roll-out and ongoing" with "application of POStPlan and throughout subsequent years during which operating hours will be continually examined" in the last sentence beginning on page 1 |
| 2 | replace "the plan" with "POStPlan" in the first full sentence |
| 2 | insert "the" after "substantiated" in the third sentence of the second paragraph |
| 3 | replace "Suppose" with "For example, suppose" in the first line |

- 3 delete “apparently” and insert “of that post office” after “study” at the end of the sentence and replace “In this example” with “In such a situation” in the third line.
- 3 replace “this is not to be” with “this will not be” and insert “the responses in” after “nor will” and insert “served by post office” after community in the fourth sentence
- 3 delete “could” and “results” in the sixth sentence
- 3 replace “will” with “could” in the second sentence of the first full paragraph
- 3 replace the third sentence of the first full paragraph with

“In coming to any judgment of community preferences, the Postal Service should consider the response rate in addition to the results of a well-conducted survey, along with the reaction of customers at the public meetings, or customer comments delivered to USPS in other ways; and the views expressed by local politicians who often do a good job of reflecting the preferences of the community they represent.
- 3 replace “questionnaire process” with “survey process” in the last sentence on the page
- 3 insert “see also response to POIR 1, Q6, Tr 91; Tr 237, lines 3 – 13” to the end of footnote 1.
- 4 replace “delivery point” with “delivery points”, “customer” with “customers” and “postal service” with “postal services” in the language of Alternative 2.
- 4 insert “Library Reference” before “USPS-LR-N2012-2/11”
- 4 replace “For example, it might say” with “It could, for example, say” and replace “PO” with “Post Office” in the last sentence beginning at the bottom of the page
- 5 replace “erroneous by” with “erroneously” in the first full sentence on the page
- 5 replace second full sentence with

“The confusion demonstrates that the survey should be tested to determine how customers understand the alternatives, and to determine whether the responses provided matches what people really intend.²”
- 5 replace “option” with “alternative” in first sentence under subheading B
- 5 replace “So the” with “A” and “option” with “alternative” in second sentence under subheading B
- 5 replace “options” with “alternatives”, “are” with “should be” and delete “the” before “POStPlan” in the third sentence under subheading B

- 5 insert “alternative” before “3”, change “option” to “alternative” and insert “as well” to the end of the last sentence of the first paragraph under subheading B
- 5 replace second paragraph under subheading B with
- “Alternative 4 also tags along with alternative 2. It is standard procedure in a discontinuance to provide post office box service at nearby post offices, and, where it can be accommodated to retain the post office box address. A respondent might think, however, that checking alternative 4 means discontinuance of the post office. If alternative 4 is not a vote for discontinuing, the person choosing alternative 4 should also be able to choose between alternatives 1 and 2. And if the Postal Service considers selection of alternative 4 to be a preference for closure its intent needs to be clear on the face of the survey.”
- 6 replace second paragraph under subheading C with
- “Finally, the survey should provide space for free-form comment. For example, there might be interest in split hours, or for later or longer hours, or for rotating hours during the course of week. Whether or not POSTPlan can accommodate such requests, it nonetheless gives the Postal Service a better idea of the community’s needs and preferences – and on a case-by-case – basis the Postal Service may find and want ways to accommodate such preferences.”
- 6 replace “respondents” with “the community’s” in the last sentence of the first paragraph under subheading D.
- 6-7 move second paragraph under subheading D to footnote 2.

APWU regrets any inconvenience to the parties but believes that no party will be prejudiced by this filing which corrects errors and makes revisions to ensure the clarity of our Reply Comments.

Respectfully submitted,

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